

USA Comments – AAHC Report – Aug 2005

Chapter 3.1.2 -- Infection with *Bonamia exitiosa*

Article 3.1.2.3.

Commodities

1. When authorising import or transit of the following *commodities*, *Competent Authorities* should not require any *Bonamia exitiosa* related conditions, regardless of the *Bonamia exitiosa* status of the *exporting country, zone or compartment*:

- a) From the species listed in Article 3.1.2.2. for any purpose:
 - i) Commercially-sterile canned or other heat treated products;
 - ii) *Gametes*, ~~eggs~~ and larvae;

3.1.2.2. which have been prepared in such a way as to minimise the risk for alternative uses (a Member Country may wish to consider the need to introduce internal measures to prevent the commodity being used for any purpose other than for human consumption):

- i) ~~Chemically~~ Preserved products (e.g. smoked, salted, pickled, marinated, etc ...);
 - ii) ...
 - iii) ...
 - iv) ...
- c) ~~For *Crassostrea gigas*, *C. virginica* and *Saccostrea glomerata* all products.~~

Rationale:

Article 3.1.2.3 1)a) ii): Eggs are gametes, so listing eggs is redundant.

Article 3.1.2.3 1)b) i): Smoking and freeze drying are physical (not chemical) processes.

Article 3.1.2.3 1)c): Since these are not susceptible species to begin with, they should not be included, otherwise one could list all non-susceptible molluscs.

Article 3.1.2.4.

***Bonamia exitiosa* free country**

A country may declare itself free from *Bonamia exitiosa* if it meets the conditions in points 1), 2), 3) or 4) below.

If a country shares a *zone* or *compartment* with one or more other countries, it can only declare itself a *Bonamia exitiosa* free country if all the areas covered by the shared water are declared *Bonamia exitiosa* free zones (see Article 3.1.2.5.).

1. A country where no species of the genus *Ostrea* is present may declare itself free from *Bonamia exitiosa* when *basic biosecurity conditions* have been met continuously in the country for at least the past 2 years.

OR

2. A country where the species listed in Article 3.1.2.2. are present but there has never been any observed occurrence of the *disease* for at least the past 10 years despite conditions – in all areas where the species are present – that are conducive to its clinical expression, as described in Chapter 3.1.2. of the *Aquatic Manual*, may declare itself free from *Bonamia exitiosa* when *basic biosecurity conditions* have been met continuously in the country for at least the past 2 years and infection with *Bonamia exitiosa* is not known to be established in wild populations.

Comment: How was 10 years determined to be an appropriate time frame?

Articles 3.1.2.7 and 3.1.2.10

The sentence in each of these articles which reads:

“The certificate ~~shall~~**should** be in accordance with the Model Certificate in Appendix 6.3.2..”

Comment: Recommend replacing the word “shall” with “should” as it is a more appropriate term when referring to a recommended procedure.